

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

B.L.,

Plaintiff, : Civil Action No. 3:15-CV-1327

v. : (Judge Mariani)

MARIROSA LAMAS, *et al.*, : (Magistrate Judge Carlson)

Defendants :

**DOC DEFENDANTS' MOTION TO DISMISS AND FOR A MORE  
DEFINITIVE STATEMENT**

DOC Defendants, by and through counsel, hereby move this Court, pursuant to Fed.R.Civ.P., No. 12(b)(6)(e), to grant the DOC Defendants' motion to dismiss and for a more definitive statement based on such grounds as set forth in the supporting brief.

Respectfully submitted,

By: /s/ Vincent R. Mazeski  
Vincent R. Mazeski  
Assistant Counsel  
Attorney I.D. No. PA73795  
Pennsylvania Department of Corrections  
Office of Chief Counsel  
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Mechanicsburg, PA 17050  
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Dated: September 4, 2015

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**CERTIFICATE OF NONCONCURRENCE**

The undersigned, Vincent R. Mazeski, counsel for DOC Defendants, hereby certifies that Counsel for Plaintiff does not concur with the Court granting DOC Defendants' motion to dismiss.

Respectfully submitted,

By: /s/ Vincent R. Mazeski  
Vincent R. Mazeski  
Assistant Counsel  
Attorney I.D. No. PA73795  
Pennsylvania Department of Corrections  
Office of Chief Counsel  
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Defendants : :

**CERTIFICATE OF SERVICE**

I hereby certify that I am this day depositing in the U.S. mail a true and correct copy of the foregoing Motion and Order upon Defendant, Rebecca Zong, 607 Belle Avenue, Boalsburg, PA 16827, and that this document has been filed electronically and is available for viewing and downloading from the ECF system by Counsel for Plaintiff and thus satisfies the service requirements under *Fed.R.Civ.P. 5(b)(2)(E); L.R. 5.7.*

/s/Renee L. DiCarlo

Renee L. DiCarlo

Legal Assistant I

Pennsylvania Department of Corrections

Office of Chief Counsel

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